

LEVI N. THOMAS,  
  
Plaintiff,  
  
vs.  
  
GREYHOUD LINES, INC. and  
FIRSTGROUP AMERICA, INC.,  
  
Defendants.

COME NOW Greyhound Lines, Inc. and FirstGroup America, Inc., Defendants in the above-styled action, and pursuant to 28 U.S.C. § 1446 hereby remove the action now pending in the Circuit Court of Davidson County, State of Tennessee, Case No. No. 17C1491 styled Levi N. Thomas, v. Greyhound Lines, Inc. and FirstGroup America, Inc., wherein Plaintiff demands judgment against Defendants, and respectfully show unto this Honorable Court as follows.

- 4824-0859-7324.1

5. At all times material to this action, Defendant FirstGroup America, Inc. was a Delaware corporation, having its principal place of business in Cincinnati, Ohio.

6. This action was commenced in the Circuit Court in and for Davidson County, Tennessee. Defendants Greyhound Lines, Inc. and FirstGroup America, Inc., initially learned of Plaintiff's Complaint, said pleading specifically naming them as Defendants for the first time, on or about June 26, 2017, following service of process on CT Corporation System, Knoxville, Tennessee.

7. The Affidavit of counsel, Brantley C. Rowlen, Esq., is submitted as **Exhibit 'A'** in support of this Notice of Removal.

8. Copies of all process, pleadings and orders served upon Defendants and such other papers that are attachments as required by 28 U.S.C. § 1446 and local court rules, are filed herein. (See composite **Exhibit 'B'**).

9. Pursuant to 28 U.S.C. §1446(d), Defendants have provided written notice to all adverse parties and have filed a copy of this Notice of Removal with the Clerk of the Circuit Court in and for Davidson County, Tennessee. (A copy of the Notice of Filing Notice of Removal to opposing counsel is attached hereto as **Exhibit 'C'**; a copy of the Certification of Notice of Removal is attached hereto as **Exhibit 'D'**).

WHEREFORE, Defendants Greyhound Lines, Inc. and FirstGroup America, Inc., respectfully submit this matter to this Court's jurisdiction.

*(signature on following page)*

This 21<sup>st</sup> day of July, 2017.

LEWIS BRISBOIS BISGAARD & SMITH, LLP

/s/Brantley C. Rowlen

Brantley C. Rowlen

Tennessee Bar No. 29730

1180 Peachtree Street, NE

Suite 2900

Atlanta, Georgia 30309

404.348.8585

404.467.8845 (fax)

[brantley.rowlen@lewisbrisbois.com](mailto:brantley.rowlen@lewisbrisbois.com)

Counsel for Defendants

Greyhound Lines, Inc. and FirstGroup America, Inc.

**CERTIFICATE OF SERVICE**

I hereby certify that I have this day served the within and foregoing **Notice of Removal** by filing same with the Clerk of the Court utilizing CM/ECF, and by sending a copy via the United States Postal Service to counsel for Plaintiff, addressed as follows:

Julie A. Reasonover, Esq.  
REASONOVER LAW FIRM  
208 23<sup>rd</sup> Avenue, North  
Suite 201  
Nashville, TN 37203  
*Attorney for the Plaintiff*

This 21<sup>st</sup> day of July, 2017.

\_\_\_\_\_  
/s/Brantley C. Rowlen

Brantley C. Rowlen  
Tennessee Bar No. 29730

1180 Peachtree Street, NE  
Suite 2900  
Atlanta, Georgia 30309  
404.348.8585  
404.467.8845 (fax)  
[brantley.rowlen@lewisbrisbois.com](mailto:brantley.rowlen@lewisbrisbois.com)

Counsel for Defendants  
Greyhound Lines, Inc. and FirstGroup America, Inc.